

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

CARLYLE AVIATION MANAGEMENT LIMITED, ACCIPITER INVESTMENTS AIRCRAFT 4 LIMITED, VERMILLION AVIATION (TWO) LIMITED, ACCIPITER HOLDINGS DAC, MAVERICK AVIATION HOLDINGS LTD., MANCHESTER AVIATION FINANCE S.à r.l., WELLS FARGO TRUST COMPANY, N.A., not in its individual capacity but solely in its capacity as OWNER TRUSTEE, UMB BANK, N.A., not in its individual capacity but solely in its capacity as OWNER TRUSTEE,

Plaintiffs,

v.

FRONTIER AIRLINES, INC.

Defendant.

Case No.: 1:23-cv-04774 (PAE)

**DECLARATION OF JED M. SCHWARTZ IN SUPPORT OF PLAINTIFFS' MOTION
FOR LEAVE TO FILE SUPPLEMENTAL COMPLAINT**

I, Jed. M. Schwartz, hereby declare as follows:

1. I am a member of the law firm Milbank LLP, counsel to Plaintiffs Carlyle Aviation Management Limited ("CAML"), Accipiter Investments Aircraft 4 Limited ("Accipiter"), Vermillion Aviation (Two) Limited ("Vermillion"), Accipiter Holdings DAC ("Accipiter Holdings"), Maverick Aviation Holdings Ltd. ("Maverick"), Manchester Aviation Finance S.à r.l. ("Manchester"), UMB Bank, N.A., not in its individual capacity but solely in its capacity as Owner Trustee ("UMB Trustee"), and Wells Fargo Trust Company, N.A., not in its individual capacity but solely in its capacity as Owner Trustee ("WF Trustee") (collectively, "Plaintiffs"), in the above-captioned action. I am a member in good standing of the bar of the State of New York and

of this Court.

2. Attached hereto as **Exhibit 1** is a redacted copy of Plaintiffs' proposed supplemental complaint.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
November 9, 2023

/s/ Jed M. Schwartz
Jed M. Schwartz